

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

REDOAK HOSPITAL, LLC,

Plaintiff,

v.

GAP INC., GAP INC. HEALTH AND  
LIFE INSURANCE PLAN, CYNTHIA  
RADOVICH, and LESLEY DALE,

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

C.A. No. 4:16-cv-01303

**APPENDIX IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

Defendants file this Appendix in Support of its Motion to Dismiss as follows:

Exhibit 1 Declaration of Cynthia Radovich

Ex. A Gap, Inc. Health and Life Insurance Plan

Ex. B Summary Plan Description (2013)

Ex. C Summary Plan Description (2014)

Ex. D RedOak's letter to Gap dated 7/14/14

Ex. E Gap's letter to Redoak dated 8/13/14

Exhibit 2 Declaration of Jane Stalinski

Ex. A United's letters to Redoak dated 9/5/14 and 8/13/14

Ex. B United's letter to Redoak dated August 21, 2014

Ex. C United's Provider Explanation of Benefits to Redoak

Ex. D United 835 Solutions Documents

Exhibit 3 MLN Matters No. MM7683

Exhibit 4 Claim Adjustment Reason Codes

Dated: June 27, 2016

Respectfully submitted,

By: /s/ Raymond E. Walker

Andrew G. Jubinsky

Texas Bar No. 11043000

Fed. I.D. No. 8603

[andy.jubinsky@figdav.com](mailto:andy.jubinsky@figdav.com)

**Attorney-in-Charge**

**Of Counsel:**

Don Colleluori

Texas Bar No. 04581950

Fed. I.D. No. 8598

[don.colleluori@figdav.com](mailto:don.colleluori@figdav.com)

Raymond E. Walker

Texas Bar No. 24037663

Fed. I.D. No. 36366

[ray.walker@figdav.com](mailto:ray.walker@figdav.com)

**FIGARI + DAVENPORT, L.L.P.**

901 Main Street, Suite 3400

Dallas, Texas 75202

Telephone: (214) 939-2000

Facsimile: (214) 939-2090

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served on the parties listed below on June 27, 2016.

**Via ECF:**

Ebad Khan

[ekhan@trinityhealthcarenetwork.com](mailto:ekhan@trinityhealthcarenetwork.com)

Trinity Healthcare Network

17400 Red Oak Drive

Houston, TX 77090

/s/ Raymond E. Walker

Raymond E. Walker